

## **Comments on Bulletin 160-98 from the League of Women Voters of the Bay Area**

Page 2-40 The discussion of Conservancies should include the State Coastal Conservancy which enables watershed acquisition, management, enhancement, restoration near the coast. BCDC and the Coastal Commission are permitting agencies.

Page 3-11 The discussion should be updated to reflect that 1998 has been the wettest winter.

Page 3-15 The discussion in the second from last paragraph: Does the calculation reflecting an increase in water supply without additional supply options reflect the amount (??) of CVP water required by the law to be allocated to fish and wildlife?

Page 3-90 While state law may require industries to pretreat industrial water prior to its discharge into municipal wastewater treatment plants, small industries do not seem to be uniformly regulated for various reasons. The discussion in the second from last paragraph should be expanded to include an overview of how industries are monitored by Regional Boards. Some (maybe all) have not gotten around to all of the industries.

Page 4-49 With regard to agriforestry, whether the research to date has demonstrated a build up of selenium, heavy metals or other constituents as salt levels increase in the soils? Also, what is the fate of the crops that are grown? Are the eucalyptus, salt grass and other crops that are grown harvested for commercial or other uses or simply harvested and dumped?

Page 4- 49 The water needs for fish, wildlife and the estuary do not seem to have been considered in this discussion.

Page 4-52 The discussion of environmental needs must be broadened to include needs of species other than endangered species and others in which there has been some court action. Native fish, migratory birds and water needed to maintain fresh to brackish wetland types in the San Francisco Estuary.

The discussion in paragraph three indicates that water for fishery and wetland restoration and enhancement would be acquired through the regulatory processes, and specifically by water transfers. We are not aware that CALFED has committed to this as a means of securing fresh water for the resources, nor is it certain that water that could be obtained from this means would be sufficient to sustain the aquatic resources. Other means of obtaining environmental water should be addressed.

Page 4-58 While the habitat restoration programs of CALFED would likely "help in the efficient management of water dedicated or acquired for environmental purposes," they will not likely be sufficient to maintain the estuary fish populations and fresh and brackish wetland resources. It should be recognized that adequate fresh water must be provided to assure the survival of these resources and the San Francisco Estuary as a whole.

Page 4-64 There are other populations of native fish that are declining including the other runs of Chinook Salmon, Sacramento Splittail and Longfin Smelt. These should also be recognized.

Page 4-65 Why are the only two efforts being conducted (or mentioned) to recover Winter-run Salmon artificial? What efforts are being made to protect, restore and/or maintain natural spawning habitats and breeding populations?

Page 4-68 The CVPIA discussion should indicate whether any water required by this law has actually been provided to fish and wildlife.

Page 4-69 The wetlands discussion should indicate how many wetlands are being lost annually in the state and in the specific regions of the state.

Page 6-2 The most obvious deficiency in the water management options evaluation is the failure to include water for the environment.

Page 10-3 The third paragraph acknowledges that the environmental water comes from legislative or regulatory actions. It is not recognized that fresh water is needed by the ecosystem for many other functions, i.e. to keep Suisun fresh/brackish; to flush out the South Bay, to maintain a mixing zone outside the Golden Gate. This is a major flaw.

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